

REMARKS

Claims 3-12, 15-24 and 26-31 are pending in the application. Claims 26-28 have been amended. Reconsideration of this application is respectfully requested.

The Office Action rejects claims 3-12, 15-24 and 26-31 under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 5,613,113 to Goldring, hereafter Goldring.

This rejection is respectfully traversed. Independent claims 26-28 recite a program has two functions. The first function defines events, activities and attributes of each for an industrial process, based on input data of a user, classifies the defined events, activities and attributes according to a data structure of event types or activity types and attribute types, and organizes storage volumes for the attribute types.

Goldring lacks at least the identifying and classifying steps of the first function. The Examiner contends that Goldring discloses the identifying step, quoting a portion of each of column 3, lines 36-38, and column 5, lines 53-56. The column 3 quotation is taken out of context. The quotation is actually referring to identifying events that have been previously recorded in the activity log and not to user entered data to define the events. Therefore, the column 3 citation is irrelevant to the recited identifying step.

The column 5 citation speaks to the capability of the user to define and update data tables. The only data tables defined by the user appear in column 5, line 8, as "user tables 28 defined by the users". There is no description of the user defining events, activities or attributes of either. Therefore, Goldring lacks the identifying step.

The Examiner contends that Goldring discloses the classifying step, citing column 8, line 60, to column 9, line 14 and Fig. 3. The textual citation and Fig. 3 describes the storage format in Goldring's activity log of time series data collected from the running financial process. There is no description of a classifying step. Therefore, Goldring lacks the classifying step.

Applicants appreciate the Examiner's comment at page 10 of the Office Action that independent claim 26 "does not require that only values for the attribute type according to a particular storage volume is organized may be stored in that particular storage volume". This is helpful to an understanding of how the Examiner views Goldring and independent claim 26.

Independent claim 26 has been amended in view of the Examiner's comment. Amended independent claim 26 recites:

"organizing a plurality of storage volumes of a database for said classified attribute types, wherein said plurality of storage volumes comprises first and second storage volumes that are organized by said attribute type for said first activity type or for said first event type and for storage of values of said attributes of said first and second attribute types, respectively, of said first activity type or of said first event type, wherein values of first and second attributes of said first and second attribute types are stored only in said first and second volumes, respectively; and
to store and retrieve said collected data of said industrial process when running by

using said data structure in a manner that permits access to said organized storage volumes of said database by said activities, events and attributes that are identified by said identifying step to store said collected data of said industrial process in said storage volumes according to said data structure and, in response to a

request, which identifies a first activity of said first activity type or a first event of said first event type and said first attribute type, to retrieve from said first storage volume at least one value of said first attribute type that corresponds to said first activity or said first event and, in response to a request, which identifies said first activity of said first activity type or said first event of said first event type and said second attribute type, to retrieve from said second storage volume at least value of said second attribute that corresponds to said first activity or said first event”.

Support for the amendment is found at pages 12 and 13 of the specification and Figs. 6 and 8 of the drawing. Goldring does not disclose “first and second storage volumes that are organized by said attribute type for said first activity type or for said first event type and for storage of values of said attributes of said first and second attribute types, respectively, of said first activity type or of said first event type, wherein values of first and second attributes of said first and second attribute types are stored only in said first and second volumes, respectively”. Goldring stores each of the Examiner’s noted attribute types in both the activity log and change data table. That is, Goldring’s activity log and change data table are not organized by attribute type such that “values of first and second attributes of said first and second attribute types are stored only in said first and second volumes, respectively”. Therefore, Goldring lacks the organizing step of amended independent claim 26.

Moreover, Goldring lacks the following recital of amended independent claim 26:

“in response to a request, which identifies a first activity of said first activity type or a first event of said first event type and said first attribute type, to retrieve from said first storage volume at least one value of said first attribute type that corresponds to said first activity or said first event and, in response to a request, which identifies said first activity of said first

activity type or said first event of said first event type and said second attribute type, to retrieve from said second storage volume at least value of said second attribute that corresponds to said first activity or said first event".

Goldingr does not disclose the recited request or the retrieval of the first activity and the values of its first and second attribute types that correspond to the first activity as recited by amended independent claim 26.

The above arguments apply to independent claims 27 and 28, which have been amended in a like manner. Therefore, amended independent claims 26-28 and their dependent claims 3-12, 15-24 and 29-31 are unobvious in view of Goldring.

For the reasons set forth above, it is submitted that the rejection of claims 3-12, 15-24 and 26-31 under 35 U.S.C. 103(a) is obviated by the amendment and should be withdrawn.

It is respectfully requested for the reasons set forth above that the rejection under 35 U.S.C. 103(a) be withdrawn, that claims 3-12, 15-24 and 26-31 be allowed and that this application be passed to issue.

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Respectfully Submitted,



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